

Non Responsive

From: Lauren Northrop
Sent: Wednesday, February 27, 2019 10:38 PM
To: William Davenport
Subject: W. Davenport: Requirement to file OGE 278 Public Financial Disclosure Report and FCC Form A-54A as a New Entrant (due 3/29)
Attachments: Fillable FCC Form A54A Jan 2019.pdf; IntegrityWizardBasicsEmph.pdf; IntegrityIncomeAssetSections278e.pdf
Importance: High

Hi, Bill.

Welcome back to the agency, and hope your first few weeks are going well.

In connection with your position as Legal Advisor, Office of Commissioner Geoffrey Starks, you are required to complete a New Entrant OGE 278 Public Financial Disclosure Report. The position you are occupying is a covered position and requires the filing of this information as a condition of employment. The disclosure covers you, your spouse and dependent children if applicable. For your ready reference, a spouse's or child's financial interests are imputed to you. Please include as much information as possible about applicable employment, pensions, 401K savings plans, IRAs, mutual funds, securities and other financial interest/holdings (see attachments 2 and 3).

Separately from the OGE 278, you are required to file Supplemental FCC Form A-54A (first attachment), as it is intended to capture interests that fall below the reporting threshold of the OGE 278 in order to meet the separate requirements of 18 U.S.C. § 208 and Section 4(b) of the Communications Act, 47 U.S.C. § 154(b). The attached form is FCC-specific and we ask you to return it to me directly after completion; emailing me a pdf of this signed form will be acceptable.

The reporting period for these forms is the preceding two calendar years up to the date of your filing. Here is a link to OGE's chart that shows you the OGE 278 reporting period broken down by section
<https://www.oge.gov/Web/278eGuide.nsf/Content/Definitions~The+OGE+Form+278e+%E2%80%93+New+Entrant+Report>

Please complete the OGE 278 in the electronic filing system known as *Integrity*, hosted by the Office of Government Ethics (OGE), as soon as possible, but no later than Friday, March 29, 2019. If you do not submit the OGE 278 by the required filing date, without an extension, you may be subject to a late filing fee of \$200, if you file after the end of the 30-day grace period. You have received or will receive an email shortly notifying you of your OGE 278 assignment. Please acknowledge receipt of this information, and let me know if you do not receive the aforementioned email.

We appreciate your attention to this requirement. Please don't hesitate to let me know if you have questions or technical issues as I am glad to assist.

Thank you,

Lauren
418.1725

P.S. I suggest clicking through all the sections by checking the "no" box for each section. The form will then be fully generated and you will be able to click on a section via hyperlinked titles in the left hand menu with the dark blue background. You will be able to make any necessary changes right up until you submit the form. Then it comes to me for review and I will let you know if anything needs to be clarified before I certify it.

You can also edit and/or move entries between sections by clicking on the description you typed in and it brings up a drop-down menu on the right-hand side.

In case it is helpful, here is a link to the Office of Government Ethics (OGE) Public Financial Disclosure Guide; it lets you click on sections to see examples of how to enter information in those areas.

<https://www.oge.gov/web/oge.nsf/Public%20Financial%20Disclosure/EA3E32C7B5CA940E85257EF100778644?opendocument>

For example, cash accounts can be listed without naming the specific bank:

<https://www.oge.gov/Web/278eGuide.nsf/2f96d42716636dbf85257f490052263c/2cc9c76f5a8ac51985257f45006687c1?OpenDocument>

Lauren Northrop
Ethics Program Manager
Office of General Counsel

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**Federal Communications Commission
Washington, D. C. 20554**

**CONFIDENTIAL SUPPLEMENTAL STATEMENT OF EMPLOYMENT AND
FINANCIAL INTERESTS
(For Use by Commission Employees Filing OGE Form 278 or OGE Form 450)**

Name (Last, First, Initial)	Title of Position
Date of Appointment to Present Position	Bureau/Office

In addition to the required disclosure on OGE Form 278 or OGE Form 450 for the current reporting period, please list below the kind of income and interest in property/assets valued below the reporting threshold of the OGE Form. Specifically, report: 1) any earned income from employment of your dependent child, and any earned income from employment for yourself or your spouse that is not disclosed on the OGE 278e or OGE 450 because it is below the reporting thresholds for those reports; 2) investment income of \$200 or less for OGE 278e filers or 1,000 or less for OGE 450 filers; and 3) assets valued at or below \$1,000 for you, your spouse or dependent child, so as to meet the separate requirements of Section 4(b) of the Communications Act, and 18 U.S.C. § 208. Do not report cash type bank accounts, savings bonds or diversified mutual funds which fall within these limits. If you have no financial interests to report, enter "None." Note that the amount of income or asset value need not be disclosed on this form. To indicate ownership please use an (S) for spouse, (DC) dependent child or (J) joint interest.

S, J DC	Identity of Asset	Type of Income	Type of Property

I certify that the statements I have made are true, complete and correct to the best of my knowledge and belief.

Date	Signature
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A Privacy Act Statement is on the reverse side of this form.

PLEASE DO NOT WRITE BELOW THIS LINE. FOR FCC USE ONLY

Date	Reviewer's Signature
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PRIVACY ACT STATEMENT

Title I of the Ethics in Government Act of 1978 (5 U.S.C. App.) Executive Order 12674, and 5 CFR Part 2634, Subpart I, of the Office of Government Ethics regulations require the reporting of this information. The primary use of the information on this form is for review by Government officials of your agency, to determine compliance with Federal conflict of interest laws and regulations. Additional disclosures of the information on this report may be made:(1)to a Federal, State, or local law enforcement agency if the disclosing agency becomes aware of a violation or potential violation of law or regulation;(2)to a court or party in a court or Federal administrative proceeding if the Government is a party or in order to comply with a subpoena;(3)to a source when necessary to obtain information relevant to a conflict of interest investigation or decision;(4)to the National Archives and Records Administration in records management inspections;(5)to the Office of Management and Budget during legislative coordination on private relief legislation; and(6)in response to a request for discovery or for the appearance of a witness in a judicial or administrative proceeding, if the information is relevant to the subject matter. This confidential report will not be disclosed to any requesting person unless authorized by law.

Falsification of information or failure to file or report information required to be reported may subject you to disciplinary action by your employing agency or other appropriate authority. Knowing and willful falsification of information required to be reported may also subject you to criminal prosecution.

Wizard Basics

Walkthrough: Filer

INTEGRITY^{gov}
Play your part

1. After logging into Integrity, look at the “My Current Reports” section on your “My Tasks” page. Any outstanding reports will be located here. To open an assigned report, click “Start.”
2. Enter and confirm your basic information and click “Next.”
3. Add any federal position you’ve held in the past 12 months. Do not include the position for which you are filing.
4. Add any outside positions you have held during the covered period.
5. Integrity will then ask you about interests and assets related to your outside positions.
6. Next, Integrity will ask about you about your spouse’s employment and related interests, if applicable.
7. Next, Integrity will ask you about other assets that are not related to any outside positions.
8. The next part covers your transactions (*Annual and Termination reports only*). If you have been timely filing Periodic Transaction Reports (PTRs) using Integrity, you can pre-populate this part with PTR data. Add any transactions not covered in a PTR.
9. Next, add your liabilities.
10. Next, add any gifts or reimbursements you have received (*Annual and Termination reports only*).
11. Finally, you will be shown a preview of your report. After you scroll to the bottom, click “Next” if you are ready to submit the report.

Attachment 2

The following lists provide non-exhaustive examples of the types of income and assets that are reported in Parts 2, 5, and 6 of the OGE Form 278e.

Examples of Items Reportable in Part 2, "Filer's Employment Assets and Income"

- Filer's bonus
- Filer's consulting fee
- Filer's deferred compensation
- Filer's defined benefit pension plan
- Filer's defined contribution plan (e.g., 401(k) plan, 403(b) plan, 457 plan, TIAA-CREF account)
- Filer's director's fee
- Filer's employee stock ownership plan
- Filer's employee stock purchase plan
- Filer's employer stock obtained through employment (e.g., by exercising a stock option)
- Filer's farming income
- Filer's fee for serving as a trustee or as an executor or administrator of an estate
- Filer's honorarium
- Filer's incentive stock option
- Filer's individual retirement account (IRA)
- Filer's investment fund created by an employer solely for employees
- Filer's law firm income
- Filer's LLC income
- Filer's long-term incentive plan
- Filer's money purchase pension plan
- Filer's partnership distribution
- Filer's partnership distributive share
- Filer's phantom stock
- Filer's restricted stock
- Filer's restricted stock unit
- Filer's salary
- Filer's self-funded defined benefit plan
- Filer's severance payment from an employer
- Filer's solo legal practice income
- Filer's split-dollar life insurance
- Filer's stock appreciation right

Examples of Items Reportable in Part 5, "Spouse's Employment Assets and Income"

- Spouse's bonus
- Spouse's consulting fee

- Spouse's deferred compensation
- Spouse's defined benefit pension plan
- Spouse's defined contribution plan (e.g., 401(k) plan, 403(b) plan, 457 plan, TIAA-CREF account)
- Spouse's director's fee
- Spouse's employee stock ownership plan
- Spouse's employee stock purchase plan
- Spouse's employer stock obtained through employment (e.g., by exercising a stock option)
- Spouse's farming income
- Spouse's fee for serving as a trustee or as an executor or administrator of an estate
- Spouse's honorarium
- Spouse's incentive stock option
- Spouse's individual retirement account (IRA)
- Spouse's investment fund created by an employer solely for employees
- Spouse's law firm income
- Spouse's LLC income
- Spouse's long-term incentive plan
- Spouse's money purchase pension plan
- Spouse's partnership distribution
- Spouse's partnership distributive share
- Spouse's phantom stock
- Spouse's restricted stock
- Spouse's restricted stock unit
- Spouse's salary
- Spouse's self-funded defined benefit plan
- Spouse's severance payment from an employer
- Spouse's solo legal practice income
- Spouse's split-dollar life insurance
- Spouse's stock appreciation right

Examples of Items Reportable in Part 6, "Other Assets and Income"

- 529 plan (college savings plan or prepaid tuition plan)
- American depositary receipt
- annuity (fixed or variable) purchased on the market
- bank account
- beneficial interest in a trust
- brokerage account
- collectible item
- common trust fund of a bank
- corporate bond (not acquired through employment)
- equity index-linked note
- exchange-traded fund
- foreign exchange position (forex)

- futures contract
- government agency security
- investment fund unrelated to employment
- life insurance (universal, variable, or whole)
- loan made to another party
- managed account
- money market account
- money market mutual fund
- mutual fund
- oil, gas, or other mineral rights lease
- put or call option not acquired through employment
- real estate
- real estate holding company (e.g., REIT)
- short sale
- stock (not acquired through employment)
- sweep account
- Treasury security
- Uniform Gifts to Minors Act account
- Uniform Transfers to Minors Act account
- unit investment trust